

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 17-cr-20465

v.

Hon. Denise P. Hood

D-1 MASHIYAT RASHID,

Defendant.

DISCOVERY NOTICE

1. The attorney for the government knows that the defendant made
 - (a) relevant written or recorded statements (including grand jury testimony), and/or
 - (b) relevant oral statements made in response to interrogation, whether before or after arrest, by a person then known to the defendant to be a government agent, whether or not the statement is included in a written record, as follows:

<u>Date</u>	<u>Agency</u>	<u>Type</u>
7/17/13	N/A	Recording
10/23/13	N/A	Recording

2. The attorney for the government knows that defendant has a prior criminal record:

NO X YES

3. The following books, papers, documents, photographs, and tangible objects are within the possession, custody, or control of the government and are intended to be used as evidence in chief at trial, are known to the government

to be material to the preparation of the defense, or were obtained from or belong to the defendant:

- Documents and billing data provided by Medicare and/or Medicare contractors;
- Records obtained from relevant State Agencies;
- Records obtained from financial institutions or financial regulators;
- Payroll records;
- Phone records;
- Recordings;
- Evidence obtained from the internet;
- Evidence obtained from cooperating witnesses;
- Evidence or photographs obtained during surveillance and other investigative activities;
- Photographs of premises taken during execution of search warrants;
- Items seized during the execution of search warrants at the following locations:

Date	Address	Docket Number
01/19/2017	Email ushh_inc@yahoo.com That is Stored at Premises Controlled by Yahoo, Inc.	17-mc-50084-1
07/12/2017	National Laboratories, Inc. 2100 W. Alexis Road, Suite B-1/B-2 Toldeo, OH 43613	17-mj-5151 (OH)
07/12/2017	Tri-State Physician Group, PC 2100 W. Alexis Road, Suite B-3 Toledo, OH 43613	17-mj-5152 (OH)
07/12/2017	Cellular Device Assigned Call Number (248) 943-1216	17-mc-50954-1
07/12/2017	AT&T Cellular Device Assigned Call Number (248) 943-1216	17-mc-50954-2
07/12/2017	Mashiyat Rashid Residence 5591 Walnut Ridge Court West Bloomfield, MI 48322	17-mc-50954-3
07/12/2017	Vitality Home Care 161 Merriman Road Garden City, MI 48135	17-mc-50954-4

07/12/2017	Senior Link Home Health Care 28157 Dequindre Road, Suite F Madison Heights, MI 48071	17-mc-50954-5
07/12/2017	Tri-County Physician Group, PC 3011 W. Grand Blvd., Suite 305/307 Detroit, MI 48202	17-mc-50954-6
07/12/2017	Tri-State Physician Group, PC 3011 W. Grand Blvd., Suite 306 Detroit, MI 48202	17-mc-50954-7
07/12/2017	New Center Medical, PC 3011 W. Grand Blvd., Suite 308 Detroit, MI 48202	17-mc-50954-8
07/12/2017	National Laboratories, Inc. 3011 W. Grand Blvd., Suite 309/310 Detroit, MI 48202	17-mc-50954-9
07/12/2017	TCW Group 3031 W. Grand Blvd., Suite 506 Detroit, MI 48202	17-mc-50954-10
07/12/2017	TCW Group 900 Wilshire Road, Suite 202 Troy, MI 48084	17-mc-50954-11
07/12/2017	TCW Group – Storage Unit 3031 W. Grand Blvd., Storage Unit #55 Detroit, MI 48202	17-mc-50954-12
07/18/2017	Email mashiyatrashid@gmail.com That is Stored at Premises Controlled by Google, Inc.	17-mc-50954-13
07/18/2017	Email ymozeb@tcwmgmt.com That is Stored at Premises Controlled by Google, Inc.	17-mc-50954-14
07/18/2017	Email mrashid@tcwmgmt.com That is Stored at Premises Controlled by Google, Inc.	17-mc-50954-15

including patient files, financial documents, corporate documents, activity logs, business records, employee files, correspondence, electronic media and storage devices, accounting records, and other

miscellaneous items and documents.

4. Results or reports of the following physical or mental examinations, or scientific tests or experiments, are within the possession, custody, or control of the government, and are either intended to be used as evidence in chief at trial or are known to the government to be material to the preparation of the defense: Not applicable.
5. The government intends to introduce at trial testimony from one or more experts in the following areas of expertise: Not applicable at this time.
6. The government may introduce evidence obtained from the execution of the following search warrants:

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07/12/2017	Mashiyat Rashid Residence 5591 Walnut Ridge Court West Bloomfield, MI 48322	17-mc-50954-3
07/12/2017	Vitality Home Care 161 Merriman Road Garden City, MI 48135	17-mc-50954-4
07/12/2017	Senior Link Home Health Care 28157 Dequindre Road, Suite F Madison Heights, MI 48071	17-mc-50954-5
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	3011 W. Grand Blvd., Suite 305/307 Detroit, MI 48202	
07/12/2017	Tri-State Physician Group, PC 3011 W. Grand Blvd., Suite 306 Detroit, MI 48202	17-mc-50954-7
07/12/2017	New Center Medical, PC 3011 W. Grand Blvd., Suite 308 Detroit, MI 48202	17-mc-50954-8
07/12/2017	National Laboratories, Inc. 3011 W. Grand Blvd., Suite 309/310 Detroit, MI 48202	17-mc-50954-9
07/12/2017	TCW Group 3031 W. Grand Blvd., Suite 506 Detroit, MI 48202	17-mc-50954-10
07/12/2017	TCW Group 900 Wilshire Road, Suite 202 Troy, MI 48084	17-mc-50954-11
07/12/2017	TCW Group – Storage Unit 3031 W. Grand Blvd., Storage Unit #55 Detroit, MI 48202	17-mc-50954-12
07/18/2017	Email mashiyatrashid@gmail.com That is Stored at Premises Controlled by Google, Inc.	17-mc-50954-13
07/18/2017	Email ymozeb@tcwmgmt.com That is Stored at Premises Controlled by Google, Inc.	17-mc-50954-14
07/18/2017	Email mrashid@tcwmgmt.com That is Stored at Premises Controlled by Google, Inc.	17-mc-50954-15

7. The government may introduce evidence obtained through wiretaps or other electronic surveillance:

Type (wiretap, bug, ect.) Docket Number(s) Not Applicable X

8. The government intends to offer evidence under Fed. R. Evid. 404(b).

NO ____ YES ____ Unsure X

9. The attorney for the government is aware of the obligations imposed by Brady v. Maryland, 373 U.S. 83 (1963), and its progeny and will comply with their obligation to provide defense counsel with exculpatory evidence that is material to either guilt or punishment in time for effective use at trial.

If the government discovers additional information of the type described in Paragraphs One through Nine, it will advise defense counsel in writing.

Upon specific request of the defendant, the government will make available for inspection or copying the items described in Paragraphs One, Three, and Four; will furnish the record referred to in Paragraph Two; will provide a summary (which will include the witnesses' qualifications, opinions, and the bases and reasons for the opinions) of the anticipated testimony described in Paragraph Five; and will provide notice of the general nature of the evidence referred to in Paragraph Eight.

The government's compliance with any specific request will trigger the defendant's duty to provide the reciprocal discovery denoted in Fed. R. Crim. P. 16(b)(1)(A)-(C). If the defendant makes a general request for discovery, the government will construe it as a request for each item described in Fed. R. Crim. P. 16(a)(1)(A)-(E). The government's compliance with the defendant's general request will trigger the defendant's duty to provide reciprocal discovery of each item specified in Fed. R. Crim. P. 16(b)(1)(A)-(C).

Daniel L. Lemisch
Acting United States Attorney

s/ Jacob Foster
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Dated: July 20, 2017

CERTIFICATE OF SERVICE

I hereby certify that, on July 20, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record who receive electronic notifications.

s/ Jacob Foster

Jacob Foster

Trial Attorney

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